Congress of the United States

Washington, DC 20515

September 7, 2001

Bradley A. Buckles, Director Bureau of Alcohol, Tobacco and Firearms P.O. Box 50221 Washington, D.C. 20091-0221

Dear Director Buckles:

We are writing to express our strong opposition to the proposed changes to the warning label regulation on alcohol containers, as discussed in ATF Notice No. 917.

This proposal, requiring that the health warning statement appear "in a prominent place on the front of the container," and more specifically dictating the design and composition of the warning statement, is unnecessary. Not only is the current warning effective, the Bureau of Alcohol, Tobacco and Firearms (ATF) already has the authority to take action against producers who violate existing law.

The current rules concerning the placement and legibility of the government warning statement are more than adequate to implement the Congressionally mandated goal of informing and reminding the public of risks associated with alcohol abuse. The evidence shows clearly that this goal is being met, the label is reaching intended target audiences, and that individuals are aware of the risks associated with alcohol abuse.

Additionally, an enforcement action, including the imposition of tough penalties, can already be taken by ATF against a producer whose label violates the act or rules implementing it. As a result, there is no need to revise the existing regulation.

Finally, as evidenced by the statements of opposition from diverse industry groups including the Wine Institute and the American Vintners Association, the proposed changes would impose an undue burden on vintners across the country. Most wineries in America are small, family-run businesses that have made significant investments in the design of their wine labels. The revised rules would be enormously costly to these businesses and are particularly unreasonable since the law's goals are being met under the current label requirements.

For the above reasons, we respectfully request that the proposed changes to the warning label regulation on alcohol containers be rejected. Thank you very much for your consideration in this important matter.

Sincerely,

MIKE THOMPSON

Co-Chair, Congressional Wine Caucus

GHORGE HALANOVICH

Chair, Congressional Wine Caucus

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